

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KALIN G. DIMITROV,

Plaintiff,

v.

GYRO LLC, GYRO COMMUNICATIONS
LIMITED, SLIPSTREAM COMMUNICATIONS,
LLC, DENTSU AEGIS NETWORK Ltd.,

Defendants.
----- X

Civil Action No. 18-cv-03600 (GHW)(DCF)

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law in Support of Motion to Dismiss Gyro Communications Limited, and the Declaration of Robert Dannhauser in Support of Motion to Dismiss Gyro Communications Limited sworn to on September 10, 2018, Defendant Gyro Communications Limited, by and through its counsel Sheppard, Mullin, Richter & Hampton LLP shall move before the Honorable Gregory H. Woods, U.S.D.J., at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and time to be determined by the Court, for an Order dismissing all claims/allegations in the Complaint filed by Plaintiff Kalin Dimitrov against Gyro Communications Limited with prejudice pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
September 14, 2018

Respectfully submitted,

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By: /s/ Eric Raphan
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